

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND

**MARY SEGUIN, *pro se***  
*Plaintiff*

v.

**GERO MEYERSIEK; *Et al.***  
*Defendants*

**C.A. No. 23-cv-00126-WES-PAS**

**DEFENDANT GERO MEYERSIEK'S MOTION FOR ENLARGEMENT OF TIME TO  
ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT (ECF 1)**

**NOW COMES** the Defendant, Gero Meyersiek (“Defendant” and/or “Meyersiek”), by and through undersigned counsel, and hereby moves for an enlargement of time to answer or otherwise respond to the Complaint filed by Plaintiff Mary Seguin (“Plaintiff”). In support thereof, Defendant Meyersiek asserts the following:

1. The subject matter of the instant Complaint as it concerns Defendant Meyersiek arises out of a dispute regarding child support arrears, consisting largely of unpaid interest, owed by Plaintiff to Defendant Meyersiek in connection with an ongoing Rhode Island Family Court proceeding. *See Meyersiek v. Seguin*, C.A. No. K20010521M (R.I. Family Ct. filed May 21, 2001). The Complaint further contains allegations arising from ancillary litigation in the Rhode Island Superior Court to which Defendant Meyersiek was not a party.
2. The issue as to the existence and/or amount of child support arrears owed by Plaintiff to Defendant Meyersiek remains pending in the Rhode Island Family Court. The matter was last heard on June 8, 2023, and is scheduled for further hearing on August 18, 2023.
3. The Complaint is of Brobdingnagian proportion, spanning over one hundred pages, containing in excess of two hundred paragraphs, and nineteen counts.
4. Given the size of the Complaint and the density of the allegations contained therein, the Defendant Meyersiek requests an enlargement of time to answer or otherwise respond, *to wit*,

sixty (60) days to investigate and prepare a meaningful response that advances this litigation in the most judicially economic manner possible.

5. On August 8, 2023, Plaintiff filed a Motion seeking an extension of time to file an Amended Complaint in the instant matter. Defendant Meyersiek has no objection to Plaintiff's Motion.
6. In light of the Plaintiff's request to file an Amended Complaint, should the same be granted Defendant Meyersiek requests an enlargement of time to answer or otherwise respond, *to wit*, sixty (60) days after service of an Amended Complaint, to provide him sufficient time to respond in a manner that is both meaningful and that advances this litigation in the most judicially economic manner possible.
7. This is Defendant Meyersiek's **First Request** for an enlargement of time to answer or otherwise respond to the Complaint.

**WHEREFORE**, Defendant Meyersiek respectfully requests that this Honorable Court grant the instant Motion and enlarge the time for Defendant Meyersiek to answer or otherwise respond to Plaintiff's Complaint by sixty (60) days, *in the alternative* if Plaintiff's Motion to File an Amended Complaint is granted that the Defendant be allowed sixty (60) days after service of Plaintiff's Amended Complaint.

Respectfully submitted,

**GERO MEYERSIEK**  
By his attorney,

Dated: August 10, 2023

/s/ Joanna M. Achille  
Joanna M. Achille (7760)  
[jachille@burnslev.com](mailto:jachille@burnslev.com)  
Burns & Levinson LLP  
One Citizens Plaza, Suite 1100  
Providence, RI 02903  
Tel: (401) 831-8330  
Fax: (617) 345-3299

**CERTIFICATION OF SERVICE**

I, Joanna M. Achille, attorney for the Defendant, Gero Meyersiek, hereby certify that on August 10, 2023, I served a copy of the within by CM/ECF electronic mail notification to all counsel of record.

/s/ Joanna M. Achille

Joanna M. Achille